

Exhibit 11

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Independent Investigators Find Governor Cuomo Sexually Harassed Multiple Women, Violated State and Federal Laws

Report by Independent Investigators Find NYS Governor Sexually Harassed Multiple Women From 2013 Through 2020

Sexual Harassment Included Unwanted and Inappropriate Groping, Kissing, Hugging, and Comments That Accusers Called "Deeply Humiliating, Uncomfortable, Offensive, or Inappropriate"

Executive Chamber "Rife with Fear and Intimidation," Enabled "Harassment to Occur and Created a Hostile Work Environment"

NEW YORK – The independent investigators appointed by New York Attorney General Letitia James — led by Joon H. Kim and Anne L. Clark — today released their [report into the multiple allegations of sexual harassment by New York Governor Andrew Cuomo](#). After nearly five months, the investigators concluded that Governor Cuomo did sexually harass multiple women — including former and current state employees — by engaging in unwanted groping, kissing, and hugging, and making inappropriate comments. Further, the governor and his senior staff took actions to retaliate against at least one former employee for coming forward with her story. Finally, the Executive Chamber fostered a "toxic" workplace that enabled "harassment to occur and created a hostile work environment." The investigators find that Governor Cuomo's actions and those of the Executive Chamber violated multiple state and federal laws, as well as the Executive Chamber's own written policies.

The investigation was conducted after, on March 1, 2021, the Executive Chamber made a referral, pursuant to New York Executive Law Section 63(8), for Attorney General James to select independent lawyers to investigate "allegations of and circumstances surrounding sexual harassment claims made against the governor." Kim and Clark were chosen to lead the investigation on March 8, 2021.

"This is a sad day for New York because independent investigators have concluded that Governor Cuomo sexually harassed multiple women and, in doing so, broke the law," said **Attorney General James**. "I am grateful to all the women who came forward to tell their stories in painstaking detail, enabling investigators to get to the truth. No man — no matter how powerful — can be allowed to harass women or violate our human rights laws, period."

Starting in December 2020, multiple women came forward with allegations that Governor Cuomo sexually harassed them. Over the course of the investigation, the investigators interviewed 179 individuals. Those interviewed included complainants, current and former members of the Executive Chamber, State Troopers, additional state employees, and others who interacted regularly with

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Backed up by corroborating evidence and credible witnesses, the investigators detail multiple current or former New York state employees or women outside state service who were the targets of harassing conduct on the part of the governor.

As part of the investigation, Governor Cuomo also sat with the interviewers and answered questions under oath. While the governor denied the most serious allegations, the investigators found that he did so by offering “blanket denials” or that he had a “lack of recollection as to specific incidents.” The investigators also found that the governor’s recollection “stood in stark contrast to the strength, specificity, and corroboration of the complainants’ recollections, as well as the reports of many other individuals who offered observations and experiences of the governor’s conduct.”

Additionally, the investigators found that the Executive Chamber was “rife with fear and intimidation” that not only “enabled the above-described instances of harassment to occur,” but also “created a hostile work environment overall.” Further, Governor Cuomo, himself, and the Executive Chamber engaged in “retaliatory” behavior by “intend[ing] to discredit and disparage” a former employee that came forward with her story of harassment.

The investigation found that Governor Cuomo’s sexual harassment of multiple women and his and the Executive Chamber’s retaliation against a former employee for coming forward with her claims of sexual harassment violated multiple state and federal laws, including Title VII of the Civil Rights Act of 1964, the New York State Human Rights Law, and 42 U.S. Code § 1983, in addition to the Executive Chamber’s own equal employment policies.

Jennifer Kennedy Park, Abena Mainoo, and Rahul Mukhi from the law firm Cleary Gottlieb Steen & Hamilton LLP were all deputized — in addition to Joon H. Kim — as Special Deputies to the First Deputy Attorney General to conduct the investigation and issue this report. Yannick Grant from the law firm Vladeck, Raskin & Clark, P.C. was deputized — in addition to Anne L. Clark — as a Special Deputy to the First Deputy Attorney General to conduct the investigation and issue this report. A number of other attorneys from both Cleary Gottlieb and Vladeck were appointed as Special Assistants to the First Deputy Attorney General to assist with the investigation.

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